Richard L. Posen (RP-3593) WILLKIE FARR & GALLAGHER One Citicorp Center 153 East 53rd Street New York, New York 10022 (212) 935-8000

Attorneys for The Trump Defendants

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

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IN RE:	:	
	:	HON. JOHN F. GERRY
DONALD J. TRUMP CASINO	:	MDL DOCKET NO. 864
SECURITIES LITIGATION	:	
TAJ MAHAL LITIGATION	:	AFFIDAVIT OF
	:	RICHARD L. POSEN
	x	
STATE OF NEW YORK )		
) ss.:		
COUNTY OF NEW YORK )		

RICHARD L. POSEN, being duly sworn, deposes and says:

- 1. I am a member of the Bar of the State of New York and various federal courts including the United States Court of Appeals for the Third Circuit, and I am a member of the firm of Willkie Farr & Gallagher, counsel for the Trump Defendants in this action. I am admitted pro hac vice before this Court in this matter. I submit this affidavit in support of the Trump Defendants' motion to dismiss the complaint.
- 2. Attached as Exhibit A to this Affidavit is a true and correct copy of the Prospectus for Trump Taj Mahal Inc.'s issuance of \$625 million of 14% First Mortgage Bonds, Series A, due 1998.